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New England Coalition On Nuclear Pollution

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POST OFFICE BOX 545, BRATTLEBORO, VERMONT 05302

July 6, 2001

RECEIVED

JUL 10 2001

Jane R. Summerson, EIS Document Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
Post Office Box 30307, M/S 010
North Las Vegas, NV 89036 - 0307

Re: Supplement to the Draft Environmental Impact Statement for a Geologic Repository, etc. (DOE/EIS-0250D-S)

Dear Jane R. Summerson,

Please accept the attached preliminary comments on the Supplement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada, submitted on behalf of the New England Coalition on Nuclear Pollution and its members throughout New England.

1 Please also convey to the Department of Energy our assessment that the selective extension of the comment deadline is an abuse of discretion that favors some interested citizens based on arbitrary and previously unannounced terms. DOE should consider that citizens may not have requested copies of the Supplement assuming that there was insufficient remaining time to gain a copy, review it, and prepare comment. Now it is revealed that those who did not receive a copy in timely manner will be accorded an additional 30 days to comment. We insist that extending the comment period for all would be no great burden for the Department of Energy and that extending the comment period would go along way toward providing equal and adequate access to the process for all interested citizens.

Allowed additional time, it would be our intention to bolster, to perfect, and to resubmit the (by force of time, brief) attached comments.

Thank you for your time and attention,

Sincerely,



Raymond Shadis

Staff Advisor

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**BEFORE THE US DEPARTMENT OF ENERGY
OFFICE OF CIVILIAN RADIOACTIVE WASTE MANAGEMENT
COMMENTS OF
THE NEW ENGLAND COALITION ON NUCLEAR POLLUTION
REGARDING**

**SUPPLEMENT TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR A
GEOLOGIC REPOSITORY FOR THE DISPOSAL OF SPENT NUCLEAR FUEL AND
HIGH- LEVEL RADIOACTIVE WASTE AT YUCCA MOUNTAIN, NYE COUNTY,
NEVADA (DOE/EIS-0250D-S)**

- 2 1. **Refined Waste Package – Use of Alloy 22** It appears that DOE has selected alloy-22 without experimental verification of the metal's corrosion resistance under conditions likely to be found in and/or about the waste package. Alloy-22 may degrade after prolonged heat sensitization and/or after exposure to hot water and/or to exposure to hot alkaline water, and/or exposure to hot acidic water. Water pH may be varied by the solution of organic deposits accumulated over centuries within the repository as well as solution of minerals.
- 3 2. **Replaced Waste Package Pedestals (Alloy 22)** Ditto.
- 4 3. **IAEA Peer Review/Biosphere Modeling Program** The supplement should reflect comments and suggestions of the International Atomic Energy Agency Review Team (IRT), An International Peer Review of the Biosphere Modelling Programme of the US Department of Energy's Yucca Mountain Site Characterization Project, April, 2001. It does not appear to do this. For example, the IRT suggested reexamination of assumptions regarding diet dose (s 15), and modeling of dose due to resuspension (s23), and a re-assessment of treatment of uncertainties in the biosphere (s 24), and a good deal more. None of this appears in the supplement. In fact, both the DEIS and the DEIS(S) are terminally inadequate in considering the effects of the project on and/or from living organisms within the design time scales, hundreds and thousands of years.

NECNP COMMENTS DEIS (S) & 6/2001 (2)

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- 5 4. **Increased Ventilation** The DEIS and the Supplement fail to consider the potential mutation of airborne microbes flowing through (and recycling through) chambers of varying radiation levels in the extraordinary volumes of air required to cool the repository. |
- 6 5. **Increased Ventilation** The DEIS and the Supplement fail to provide adequate analysis of the ventilation design ability to maintain flow through when blocked, or partially blocked, by the accumulation of organic matter (vegetation, rodent or bird feces) or wind-driven soil drifts over the design time scales. |
- 7 6. **Uncertainties** The DEIS and the Supplement fail to address the future impact of changes taking place in the biosphere, such as the extinction of species and/or the extension of the range of species. |

Respectfully Submitted,
Raymond Shadis, New Coalition Staff Advisor